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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

HAMEL TOURE and ANDREA BURCH,
individually and on behalf all others similarly
situated,

Plaintiffs,

v.

AMERIGROUP CORP. and AMERIGROUP
NEW YORK, LLC d/b/a Amerigroup Community
Care,

Defendants.

10 Civ. 5391 (RLM)

**NOTICE OF MOTION FOR CERTIFICATION OF THE SETTLEMENT CLASS,
FINAL APPROVAL OF THE CLASS ACTION SETTLEMENT,
AND APPROVAL OF THE FLSA SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and Approval of the FLSA Settlement and in the Declaration of Rachel Bien ("Bien Decl.") and accompanying exhibits, Plaintiffs respectfully request that the Court enter an Order:

- (1) certifying the settlement class;
- (2) granting final approval of the Joint Stipulation of Settlement and Release ("Settlement Agreement"), attached as Exhibit A to the Bien Decl.;

- (2) granting approval of the FLSA settlement; and
- (3) granting such other, further, or different relief as the court deems just and proper.

Plaintiffs have submitted a Proposed Order, attached hereto as **Exhibit A**, for the Court's convenience.

Dated: July 23, 2012
New York, New York

Respectfully submitted,
OUTTEN & GOLDEN LLP

/s/ Rachel Bien
Rachel Bien

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